

COMMONWEALTH OF VIRGINIA
STATE CORPORATION COMMISSION
AT RICHMOND, APRIL 10, 2023

900 - CLERK'S OFFICE
DOCUMENT CONTROL CENTER

2023 APR 10 P 2:10

PETITION OF

DISH WIRELESS L.L.C.

CASE NO. PUR-2023-00018

For designation as an eligible
telecommunications carrier in the
Commonwealth of Virginia for the
limited purpose of providing Lifeline
service to qualifying customers

ORDER FOR NOTICE AND COMMENT

On February 9, 2023, DISH Wireless L.L.C. ("DISH Wireless" or "Company"), filed a petition ("Petition") with the State Corporation Commission ("Commission") pursuant to 47 U.S.C. § 214(e)(2), §§ 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),¹ and Chapter 436 of the 2022 Virginia Acts of Assembly,² and 5 VAC 5-20-100 A of the Rules of Practice and Procedure of the Commission,³ requesting that the Commission enter an order designating DISH Wireless as an eligible telecommunications carrier ("ETC") in the Commonwealth of Virginia.⁴ Specifically, DISH Wireless seeks ETC designation for the limited purpose of providing Lifeline service under the brand name "Gen Mobile" to qualifying Virginia customers.⁵

¹ 47 C.F.R. §§ 54.101-54.207.

² Codified at § 56-479.4 of the Code of Virginia

³ 5 VAC 5-20-10 *et seq.* ("Rules of Practice").

⁴ Petition at 1.

⁵ *Id.*

The Company states that it currently operates as a reseller and uses AT&T and T-Mobile wireless facilities to provide discounted mobile broadband service in all 50 states, Washington DC, and Puerto Rico, and is in the process of building out its own advanced nationwide 5G network.⁶ The Company seeks designation to operate as an ETC throughout the entire boundary of Virginia subject to coverage limits of underlying carriers and DISH Wireless' own network.⁷

In support of the Petition, DISH Wireless states that it is currently designated as a wireless ETC in the states of Colorado and New York; is authorized by the California Public Utilities Commission to provide California Lifeline service; and has applications pending with the FCC for the states of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, the District of Columbia, and Tribal areas.⁸

DISH Wireless states that it has the ability to provide all services supported by the universal service program throughout Virginia, and will meet or exceed the FCC's minimum service standards set forth in 47 C.F.R. § 54.408, including updates to the standards going forward.⁹ According to the Petition, DISH Wireless proposes initially to offer Lifeline plans in Virginia that include voice, text messaging, and broadband services, as well as voice grade access to the public switched network or its functional equivalent, minutes of use for local service at no additional charge to end users, access to 911 and enhanced 911, and toll limitation services to qualifying low-income consumers.¹⁰

⁶ *Id.* at 2-3, 7-8.

⁷ *Id.* at 8 and Exhibit 3.

⁸ *Id.* at 3-4.

⁹ *Id.* at 11.

¹⁰ *Id.* at 6-7.

DISH Wireless states that the Company meets the requirements for ETC designation pursuant to 47 U.S.C. § 214(e)(2) and associated FCC regulations.¹¹ The Company asserts that because DISH Wireless is deploying facilities-based wireless voice and broadband services in Virginia and other states, there is no need for the Company to obtain an approved FCC Compliance Plan in accordance with the 2012 Lifeline Reform Order.¹² For purposes of demonstrating that it will satisfy applicable consumer protection and service quality standards, DISH Wireless states that it will comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service.¹³

NOW THE COMMISSION, upon consideration of the Petition and applicable law, is of the opinion and finds that, consistent with prior orders in similar proceedings,¹⁴ local exchange carriers ("LECs") and other interested persons or entities should have an opportunity to file comments, objections, or requests for hearing on the Petition. We direct DISH Wireless to email

¹¹ See *id.* at 5-15.

¹² *Id.* at 8; See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket Nos. 11-42 and 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("2012 Lifeline Reform Order").

¹³ Petition at 10.

¹⁴ See, e.g., *Commonwealth of Virginia, ex rel., State Corporation Commission, Ex Parte, In re: Implementation of Requirements of § 214 (e) of the Telecommunications Act of 1996*, and *Application of Cox Virginia Telcom, L.L.C., For designation as an eligible telecommunications carrier under 47 U.S.C. § 214 (e)*, Case Nos. PUC-1997-00135 and PUC-2012-00059, Doc. Con. Cen. No. 121119018, Order Requesting Comments, Objections, or Requests for Hearing (Nov. 1, 2012) (noting that the Commission established Case No. PUC-1997-00135 to consider the requests of local exchange carriers to be designated as ETCs to receive universal support pursuant to the U.S. Code and associated federal regulations); *Application of RiverStreet Communications of Virginia, Inc., For designation as an eligible telecommunications carrier*, Case No. PUR-2018-00172, Doc. Con. Cen. No. 181120210, Order for Notice and Comment (Nov. 7, 2018); *Application of Cox Virginia Telcom, L.L.C., For eligible telecommunications carrier designation*, Case No. PUR-2021-00002, Doc. Con. Cen. No. 210110178, Order for Notice and Comment (Jan. 11, 2021); *Application of Q LINK WIRELESS LLC, For designation as an eligible telecommunications carrier*, Case No. PUR-2022-00110, Doc. Con. Cen. No. 220810074, Order for Notice and Comment (Aug. 3, 2022); *Application of Telrite Corporation d/b/a Life Wireless, For designation as an eligible telecommunications carrier*, Case No. PUR-2022-00129, Doc. Con. Cen. No. 220920076, Order for Notice and Comment (Sept. 19, 2022).

a copy of this Order for Notice and Comment to all LECs certificated to provide service in Virginia. We further find that the Company should provide public notice of its Petition. We find that any objections to DISH Wireless' Petition should include a statement of the reasons for such opposition, and if the objection is related to a specific territory, that territory should be clearly defined. We find that requests for hearing shall state with specificity why such concerns cannot be adequately addressed in written comments or objections. Finally, we find that the Staff of the Commission ("Staff") should investigate the Petition and present its findings and recommendations in a report ("Staff Report").

To promote administrative efficiency and timely service of filings upon participants, the Commission will, among other things, direct the electronic filing of testimony and pleadings unless they contain confidential information, and require electronic service on parties to this proceeding.

Accordingly, IT IS ORDERED THAT:

(1) This case is docketed and assigned Case No. PUR-2023-00018.

(2) All pleadings, briefs, or other documents required to be served in this matter shall be submitted electronically to the extent authorized by 5 VAC 5-20-150, *Copies and format*, of the Commission's Rules of Practice. Confidential and Extraordinarily Sensitive Information shall not be submitted electronically and should comply with 5 VAC 5-20-170, *Confidential information*, of the Rules of Practice. Any person seeking to hand deliver and physically file or submit any pleading or other document shall contact the Clerk's Office Document Control Center at (804) 371-9838 to arrange the delivery.

(3) Pursuant to 5 VAC 5-20-140, *Filing and service*, of the Commission's Rules of Practice, the Commission directs that service on parties and the Staff in this matter shall be

accomplished by electronic means. Concerning Confidential or Extraordinarily Sensitive Information, parties and the Staff are instructed to work together to agree upon the manner in which documents containing such information shall be served upon one another, to the extent practicable, in an electronically protected manner, even if such information is unable to be filed in the Office of the Clerk, so that no party or the Staff is impeded from preparing its case.

(4) On or before May 5, 2023, DISH Wireless shall provide a copy of this Order for Notice and Comment by email to each local exchange telephone carrier certificated in Virginia. A list of the current email address on file with the Commission for each of the current local exchange carriers in Virginia is attached as Appendix A to this Order.

(5) On or before May 5, 2023, DISH Wireless shall complete publication of the following notice to be published on one (1) occasion, as classified advertising, in newspapers having general circulation throughout its proposed service territory:

NOTICE TO THE PUBLIC OF A PETITION BY
DISH WIRELESS L.L.C., FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER IN THE
COMMONWEALTH OF VIRGINIA FOR THE LIMITED
PURPOSE OF PROVIDING LIFELINE SERVICE TO
QUALIFYING CUSTOMERS
CASE NO. PUR-2023-00018

On February 9, 2023, DISH Wireless L.L.C. ("DISH Wireless" or "Company"), filed a petition ("Petition") with the State Corporation Commission ("Commission") pursuant to 47 U.S.C. § 214(e)(2), §§ 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"), and Chapter 436 of the 2022 Virginia Acts of Assembly, and 5 VAC 5-20-100 A of the Rules of Practice and Procedure of the Commission, requesting that the Commission enter an order designating DISH Wireless as an eligible telecommunications carrier ("ETC") in the Commonwealth of Virginia. Specifically, DISH Wireless seeks ETC designation for the limited purpose of providing Lifeline service under the brand name "Gen Mobile" to qualifying Virginia customers. The Company states that it currently operates as a reseller and uses AT&T and T-Mobile

wireless facilities to provide discounted mobile broadband service in all 50 states, Washington DC, and Puerto Rico, and is in the process of building out its own advanced nationwide 5G network.¹⁵ The Company seeks designation to operate as an ETC throughout the entire boundary of Virginia subject to coverage limits of underlying carriers and DISH Wireless' own network.

In support of the Petition, DISH Wireless states that it is currently designated as a wireless ETC in the states of Colorado and New York; is authorized by the California Public Utilities Commission to provide California Lifeline service; and has applications pending with the FCC for the states of Alabama, Connecticut, Delaware, Florida, New Hampshire, North Carolina, the District of Columbia, and Tribal areas.

DISH Wireless states that it has the ability to provide all services supported by the universal service program throughout Virginia, and will meet or exceed the FCC's minimum service standards set forth in 47 C.F.R. § 54.408, including updates to the standards going forward. According to the Petition, DISH Wireless proposes initially to offer Lifeline plans in Virginia that include voice, text messaging, and broadband services, as well as voice grade access to the public switched network or its functional equivalent, minutes of use for local service at no additional charge to end users, access to 911 and enhanced 911, and toll limitation services to qualifying low-income consumers.

DISH Wireless states that the Company meets the requirements for ETC designation pursuant to 47 U.S.C. § 214(e)(2) and associated FCC regulations. The Company asserts that because DISH Wireless is deploying facilities-based wireless voice and broadband services in Virginia and other states, there is no need for the Company to obtain an approved FCC Compliance Plan in accordance with the 2012 Lifeline Reform Order. For purposes of demonstrating that it will satisfy applicable consumer protection and service quality standards, DISH Wireless states that it will comply with the Cellular Telecommunications and Internet Association's Consumer Code for Wireless Service.

Electronic copies of the Petition may be obtained, at no charge, by submitting a written request to counsel for DISH Wireless: Alison Minea, Vice President and Associate General Counsel, DISH Wireless L.L.C., 1110 Vermont Avenue N.W., Suite 450, Washington, DC 20005, alison.minea@dish.com. A copy of

¹⁵ *Id.* at 3, 7.

the Petition and related documents may be downloaded from the Commission's website: scc.virginia.gov/pages/Case-Information.

On or before May 31, 2023, any interested person or entity may submit comments on the Petition electronically by following the instructions on the Commission's website: scc.virginia.gov/casecomments/Submit-Public-Comments. Those unable, as a practical matter, to submit comments electronically may file such comments by U.S. mail to the Clerk of the Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. All comments shall refer to Case No. PUR-2023-00018.

On or before May 31, 2023, any interested person or entity may file objections to the Petition and/or a request for a hearing on the Petition with the Clerk of the Commission at scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to file electronically may file objections and/or a request for hearing by U.S. mail to the Clerk of the Commission at the address listed above. Such filings shall include the email addresses of such parties or their counsel, if available. A copy thereof also must be sent to counsel for the Company. Requests for a hearing shall include: (i) a precise statement of the filing party's interest in the proceeding; (ii) a statement of the specific action sought to the extent then known; (iii) a statement of the legal basis for such action; and (iv) a precise statement why a hearing should be conducted in this matter. All objections and requests for a hearing shall refer to Case No. PUR-2023-00018.

DISH WIRELESS, LLC

(6) DISH Wireless shall respond promptly to requests from interested persons or entities for copies of the Petition and shall provide one (1) copy free of charge. An electronic copy may be obtained by submitting a written request to counsel for DISH Wireless: Alison Minea, Vice President and Associate General Counsel, DISH Wireless L.L.C., 1110 Vermont Avenue N.W., Suite 450, Washington, DC 20005, alison.minea@dish.com. Interested persons may download unofficial copies of the Petition and related documents from the Commission's website: scc.virginia.gov/pages/Case-Information.

(7) On or before May 31, 2023, DISH Wireless shall file with the Commission proof of the service and notice required by Ordering Paragraphs (4) and (5).

(8) On or before May 31, 2023, any interested person or entity may file comments on the Petition by following the instructions found on the Commission's website:

scc.virginia.gov/casecomments/Submit-Public-Comments. Those unable, as a practical matter, to submit comments electronically may file such comments by U.S. mail to the Clerk of the Commission, c/o Document Control Center, P.O. Box 2118, Richmond, Virginia 23218-2118. All comments shall refer to Case No. PUR-2023-00018.

(9) On or before May 31, 2023, any interested person or entity may file objections to DISH Wireless' Petition by filing such objections with the Clerk of the Commission at: scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to file electronically may file objections to the Petition by U.S. mail to the Clerk of the Commission at the address listed in Ordering Paragraph (8). A copy of such objections must also be sent to counsel for the Company. Any objections to the Company's Petition shall include a statement of the reasons for such opposition, and if the objection is related to a specific territory, that territory shall be clearly defined. Filed objections shall reference Case No. PUR-2023-00018.

(10) On or before May 31, 2023, any interested person or entity may file a request for a hearing with the Clerk of the Commission at scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to file electronically may file a request for hearing by U.S. mail to the Clerk of the Commission at the address listed in Ordering Paragraph (8). Such request for hearing shall include the email addresses of such parties or their counsel, if available. A copy of the request for hearing must also be sent to counsel for the Company. Requests for a hearing shall include: (i) a precise statement of the filing party's interest in the proceeding; (ii) a statement of the

specific action sought to the extent then known; (iii) a statement of the legal basis for such action; and (iv) a precise statement why a hearing should be conducted in this matter. All requests for a hearing shall refer to Case No. PUR-2023-00018.

(11) On or before May 31, 2023, any person or entity wishing to participate as a respondent in this proceeding may do so by filing a notice of participation at scc.virginia.gov/clk/efiling. Those unable, as a practical matter, to file a notice of participation electronically may file such notice by U.S. mail with the Clerk of the Commission at the address listed in Ordering Paragraph (8). Such notice of participation shall include the email addresses of such parties or their counsel. A copy of the notice of participation must also be sent to counsel for the Company. Pursuant to 5 VAC 5-20-80 B, *Participation as a respondent*, of the Commission's Rules of Practice, any notice of participation shall set forth: (i) a precise statement of the interest of the respondent; (ii) a statement of the specific action sought to the extent then known; and (iii) the factual and legal basis for the action. Any organization, corporation, or government body participating as a respondent must be represented by counsel as required by 5 VAC 5-20-30, *Counsel*, of the Rules of Practice. All filings shall refer to Case No. PUR-2023-00018.

(12) The Staff shall investigate the Company's Petition. On or before July 12, 2023, the Staff shall file with the Clerk of the Commission a Staff Report containing its findings and recommendations, and Staff promptly shall serve a copy of the same on counsel to the Company and any respondents.

(13) On or before August 2, 2023, DISH Wireless may file with the Clerk of the Commission at scc.virginia.gov/clk/efiling, any response to the Staff Report and/or to any comments, objections, or requests for hearing filed with the Commission. A copy of the

response shall be sent electronically to Staff and the Commission's Office of General Counsel and to any person who filed comments, objections, or a request for a hearing on the Petition.

(14) All documents filed in paper form with the Office of the Clerk of the Commission in this docket may use both sides of the paper. In all other respects, except as modified herein, all filings shall comply fully with the requirements of 5 VAC 5-20-150, *Copies and format*, of the Commission's Rules of Practice.

(15) The Commission's Rule of Practice 5 VAC 5-20-260, *Interrogatories or requests for production of documents and things*, shall be modified for this proceeding as follows: responses and objections to written interrogatories and requests for production of documents shall be served within seven (7) calendar days after receipt of the same. In addition to the service requirements of 5 VAC 5-20-260 of the Rules of Practice, on the day that copies are filed with the Clerk of the Commission, a copy of the interrogatory or request for production shall be served electronically on the party to whom the interrogatory or request for production is directed or the assigned Staff attorney,¹⁶ if the interrogatory or request for production is directed to Staff. Except as modified above, discovery shall be in accordance with Part IV of the Commission's Rules of Practice, 5 VAC 5-20-240 *et seq.*

(16) This matter is continued.

Commissioner Patricia L. West participated in this matter.

A COPY hereof shall be sent electronically by the Clerk of the Commission to all persons on the official Service List in this matter. The Service List is available from the Clerk of the Commission.

¹⁶ The assigned Staff attorney is identified on the Commission's website, scc.virginia.gov/pages/Case-Information, by clicking "Docket Search," then clicking "Search by Case Information," and entering the case number, PUR-2023-00018, in the appropriate box.

LEC Phone Companies		
Company	Regulatory Contact	Email
Access One of Virginia, Inc.	Julie May	jmay@accessoneinc.com
ACN Communication Services, LLC	Jeremy Smuckler	LegalNotices@acninc.com
Airespring Virginia LLC	Cynthia Firstman	cat@airespring.com
Airus Virginia, Inc.	John McCluskey	jmccluskey@airustel.com
All Points Carrier Services, LLC	James Carr	business@allpointsbroadband.com
All Points Northern Neck, LLC	James Carr	business@allpointsbroadband.com
Allied Telecom Group, LLC	Ken Williams	kwilliams@alliedtelecom.net
AMCS Networking Services LLC	Robert Stankey	robertstankey@ddwt.com
Amelia Telephone Corporation	Bruce Mottern**	bruce.mottern@tdstelecom.com
AOC Connect, LLC	Michelle Silvia	msilvia@aocwins.com
APB Partners Culpeper, LLC	Mark N. Zaruba**	mzaruba@allpointsbroadband.com
APB Partners Hanover, LLC	Mark N. Zaruba**	mzaruba@allpointsbroadband.com
APB Partners Loudoun, LLC	Mark N. Zaruba**	mzaruba@allpointsbroadband.com
APB Partners Middlesex, LLC	Mark N. Zaruba**	mzaruba@allpointsbroadband.com
APB Partners Pulaski, LLC	Mark N. Zaruba**	mzaruba@allpointsbroadband.com
APB Partners Valley, LLC	Mark N. Zaruba**	mzaruba@allpointsbroadband.com
AT&T Communications of Virginia, LLC	Richard T. "Chip" Howell**	rh2514@att.com
ATC Outdoor DAS, LLC	Lauren M Ramirez	Lauren.Ramirez@americantower.com
Atlantech Online of Virginia, L.L.C.	Ed Fineran	efineran@atlantech.net
B&D Communications, LLX	Bud Caspari	Bud.caspari@bdexcavating.com
Bandwidth.com CLEC, LLC	W. Christopher Matton	cmatton@bandwidth.com
Barr Tell USA, Inc.	Harold Barr	Hb@bartell.com
BCM ONE, Inc.	Sadia Mendez	Smendez@bcmone.com
BCN Telecom of Virginia, Inc.	Kathleen Goreiy	Kgorey@bcntele.com
Benchmark Utility Services LLC	Danny Raynes	draynes@benchmarkutilityservices.com
BIF IV Intrepid OpCo LLC	Elena Spinks	elena.spinks@intrepidfiber.com or info@intrepidfiber.com
BIT Networks, LLC	James Patrick Guy II**	jguy@MECKELEC.ORG
Broadview Networks of Virginia, Inc.	Steve Bogdan **	sbogdan@broadviewnet.com
Broadvox-CLEC, LLC	Susan Cramer-Rapinz	ag@gertsburglaw.com
Broadwing Communications, LLC	Al Lubeck**	al.lubeck@lumen.com
BTR Fiber LLC	Thomas E. Jaskiewicz	tomiaski@btrusa.com

BullsEye Telecom of Virginia, LLC	David Bailey	dbailey@bullseyetelecom.com
Burke's Garden Telephone Company, Inc.	Fred Lawless	fbawless@bgtco.net
Business Telecom of Virginia, Inc.	Becky West**	Becky.West@windstream.com
Cavalier Broadband, LLC	Anthony O'Brien	tony@helixsystems.com
Cavalier Telephone, L.L.C.	Becky West**	Becky.West@windstream.com
CBTS Virginia LLC	Ted Heckmann	Ted.heckmann@cinbell.com
Cebridge Telecom VA, LLC	Dennis Moffit	dennis.moffit@suddenlink.com
Central Telephone Company of Virginia	Ted M. Hankins**	ted.hankins@brightspeed.com
CenturyLink Communications, LLC	Darlene Terry	Darlene.terry@lumen.com
CenturyTel Broadband Services, LLC	Ted M. Hankins**	ted.hankins@brightspeed.com
Charter Fiberlink VA-CCO, LLC	Betty Sanders	betty.sanders@charter.com
Citizens Telephone Cooperative	J. Gregory Sapp	gregsapp@citizens.coop
City of Danville d/b/a Danville Dept of Utilities	Jason Grey	greyjc@danvilleva.gov
City of Franklin	Zachary Wright	zwright@franklinva.com
City of Manassas	Tony H. Dawood	tdawood@ci.manassas.va.us
City of Martinsville	Michael A. Scaffidi	mscaffidi@ci.martinsville.va.us
City of Radford	Tim Logwood	Tim.Logwood@radfordva.gov
City of Salem	A. K. Briele	abriele@salemva.gov
Clear Rate Telecom, L.L.C.	Kelsey Cooke	legal@clearrate.com
Cogeco US Enterprise, LLC	Leslie Brown	legal@breezeline.com
Comcast Phone of Virginia, LLC	John Conwell**	John_Conwell@comcast.com
Communication Tech. Carrier Services, Inc.	Joseph E. Fergus	jfergus@comtechnologies.com
Conterra Ultra Broadband, LLC	Tanya Gardner	tgardner@conterra.com
Coretel Virginal LLC	Christopher Van De Verg	chris@coretel.net
Cox Virginia Telcom, L.L.C.	Robert J. Howely	Robert.howley@cox.com
CPV Communications Company	Louis A. Lombardi	llombardi@cpvcom.net
Crexendo Business Solutions of Virginia, Inc.	Jeffrey G. Korn	jkorn@crexendo.com
Crown Castle Fiber LLC	Fernanda Biehl	fernanda.biehl@crowncastle.com
CTC Communications of Virginia, Inc.	Becky West**	Becky.West@windstream.com
Dark Fiber and Infrastructure, LLC	Judd Carothers	judd@fiberandconduit.com
Data Stream Telecom of Virginia, Inc.	Sean Lee	slee@dswltech.net
dishNET Wireline L.L.C. of Virginia	Tamara Volmer	tamara.volmer@dish.com
Down Under Communications, LLC	Daryl Dunbar	Daryl@Downunderc.com
DukeNet Communications, LLC	Lin S. Altamura & Tom Dougherty	Lin.Altamura@dukenet.com dougherty@fhlhlaw.com

EarthLink Business, LLC	Becky West**	Becky.West@windstream.com
EMPOWER Telecom, Inc.	James Patrick Guy II**	jpguy@MECKELEC.ORG
eNetworks, LLC	Gina Lawrence	Gina.lawrence@essentia-inc.com
EnTelegent Solutions of Virginia, Inc.	Michael Ruziska and Tom Turpin	Michael.ruziska@entelegent.com Tom.Turpin@entelegent.com
ExteNet Asset Entity, LLC	Brian Kirk	bkirk@extenetsystems.com
ExteNet Systems (Virginia) LLC	H. Anthony Lehv	alehv@extenetsystems.com
Fiber Connect LLC	Clifford Paul	cpaul@fiber-connect.com
Fiber Roads, LLC	Jeffrey W. Cornejo	regulatory@fiberroads.com
FiberLight of Virginia, LLC	Joanne Petersen	Joanne.Petersen@FiberLight.com
FiberNet of Virginia, Inc.	Steven Hamula	hamulas@lumosnet.com
First Communications, LLC	Shannon Dieringer	sdieringer@firstcomm.com
France Telecom Corporate Solutions L.L.C.	Joe Topel	joe.topel@orange.com
Frontier Communications of Virginia, Inc.	Angela McCall	angie.mccall@ftr.com
Fusion Cloud Services, LLC	Ronald A. Sheehan**	Ronald.Sheehan@fusionconnect.com
Fusion Communications, LLC	Ronald A. Sheehan**	Ronald.Sheehan@fusionconnect.com
Fusion Connect LLC d/b/a Fusion LLC	Ronald A. Sheehan**	Ronald.Sheehan@fusionconnect.com
GC Pivotal, LLC	Kevin Sullivan	Kevin.Sullivan@gtt.net and tax@gtt.net
GCR Telecommunications, Inc.	Glenn C. Ratliff	GCR@GCRCompany.com
GetGo Communications Virginia LLC	Victor Bunaev	victor.bunaev@logmein.com
GigaCom, LLC	Dean Cline	dcline@gigacom.net
GigaMonster Networks, LLC	Ronald K. Rueve	rkrueve@gigamonster.net
Global Crossing Telemanagement VA, LLC	Al Lubeck**	al.lubeck@lumen.com
Goff Network Technologies - Virginia, Inc.	Matthew Van Hoesen	Matthew.VanHoesen@usa-groups.com
Granite Telecommunications, LLC	Paula Foley	Paula.Foley@granitenet.com
Highland Telephone Cooperative	Chad Kimbble	kimble@htcnet.org
Hudson Fiber Network (Virginia) LLC	Brian Kirk	compliance@util.extenetsystems.com
IDT America of Virginia, LLC	John Peterson	john.peterson@IDT.net
iGo Technology, Inc.	Terri Firestein	tfireccg@myactv.net
Intellifiber Networks, LLC	Becky West**	Becky.West@windstream.com
Intrado Communications, LLC	Mary Jane Rasher	mrasher@intrado.com
Intrado Safety Communications of Virginia Inc.	Mary Jane Rasher	mrasher@intrado.com
Kinex Telecom, Inc.	Jim Garrett	jgarrett@kinextel.com

Level 3 Communications of Virginia, Inc.	Al Lubeck**	al.lubeck@lumen.com
Level 3 Communications, LLC	Al Lubeck**	al.lubeck@lumen.com
Level 3 Telecom of Virginia, LLC	Al Lubeck**	al.lubeck@lumen.com
Ligado Networks Inc. of Virginia	Amy Crawford	amy@ligado.com ; and compliance@ligado.com
Lingo Telecom of Virginia, LLC	Aurora Ares	aarea@impacttelecom.com
LMK Communications, LLC	Tim Pressley**	Tim.pressley@lumosfiber.com
Local Access LLC	Robert Russell	brussell@localaccessholdings.com
LTS Telecom Services (East) LLC	Karen Graham	Karen.graham@ledcor.com
Lumos Networks Inc.	Tim Pressley**	Tim.pressley@lumosfiber.com
Lumos Telephone Inc.	Tim Pressley**	Tim.pressley@lumosfiber.com
Lumos Telephone of Botetourt Inc.	Tim Pressley**	Tim.pressley@lumosfiber.com
Maverick Virginia Infrastructure, LLC	Bryan McNally	Bmcnally@maverickcorporation.com
MCC Telephony of the Mid-Atlantic, LLC	Anne Sokolin-Maimon	amaimon@mediacomcc.com
MCImetro Access Transmission Services of Virginia Inc.	Jan Chesney	jan.chesney@verizon.com
Metro Fiber Networks, Inc.	Gary H. Tarpley and Courtney Tarpley	Gary.Tarpley@MetroNetInc.com Courtney.Tarpley@MetroNetInc.com
Metro FiberNet, LLC d/b/a MetroNet	Randy Kiesel**	Randy.Kiesel@metronetinc.com
MetroDuct Systems VA LLC	Joseph G. Blake	jgblake@teamfishel.com
Metropolitan Network Services, Inc.	Robert Jones	rjones@jucinc.net
MetTel of VA, Inc.	Andoni Economou	aeconomou@mettel.net
MGW Networks, L.L.C.	R. Craig Smith**	rcraigsmith@mgwnet.com
MGW Telephone Company Inc.	R. Craig Smith**	rcraigsmith@mgwnet.com
Mikrotec Communications of Virginia, LLC	James Campbell	jcamp@mis.net
Mobilitie, LLC	Chris Glass	chris@mobilitie.com
Motorola Solutions Connectivity of VA, Inc.	Karen Wolf	Karen.Wolf@motorolasolutions.com
MountaiNet Telephone Company	Gwen Godsey	GwenG@mounet.com
Neutral Tandem LLC-Virginia LLC	Richard Monto	rmonto@neutraltandem.com
New Castle Telephone Company	Bruce Mottern**	bruce.mottern@tdstelecom.com
New Century Telecom, Inc.	Kayrn Bartel	mail@newcenturytelecom.com
New Hope Telephone Cooperative	Timothy M. Harris	timharris@newhopetel.com
New Horizons Communications of Virginia, Inc.	Glen E. Nelson	gnelson@nhcgrp.com
NextGen Communications, Inc	Bruce A. White	TCSRegulatoryCompliance@telecomsys.com
NGA 911, L.L.C.	Don Ferguson	don@nga911.com
NOS Communications, Inc.	Jessica Renneker	Jrenneker@aninetworks.com

Nova Fiber, LLC	Erika Benson	bensoned@diodeventures.com
One Voice Communications, Inc.	James K. Dize	kdize@onevoiceinc.com
Onvoy LLC	Mary Buley	mary.buley@onvoy.com
OpenBand of Virginia, LLC	Ashley Jackson	Ashley.Jackson@mcdean.com
PaeTec Communications of Virginia, Inc.	Becky West**	Becky.West@windstream.com
Peerless Network of Virginia, LLC	Patrick Phipps	pphipps@peerlessnetwork.com
PEG Bandwidth VA, LLC	Jeffrey Strenkowski	jeffrey.strenkowski@uniti.com
Pembroke Telephone Cooperative	Tony Eaton	aceaton@pemtel.net
Peoples Mutual Telephone Company Inc.	Tim Tribble	timtribble@wilkestmc.net
PNG Telecommunications of Virginia, LLC	Tanya King	tax@powernetco.com
QCT, LLC	Scott A. Sterling	ssterling@americanrepartners.com
Qloop, LLC	John W. Anderson	john@qgl.email
QuantumShift Communications of Virginia, Inc.	Scott A. Sterling	ssterling@americanrepartners.com
Qwest Communications Corporation of Virginia	Al Lubeck**	al.lubeck@lumen.com
Red Truck Wireless, LLC	Richard P. Biby	rbiby@two-hops.com
RiverStreet Communications of Virginia, Inc.	Tim Tribble	Timtribble@myriverstreet.net
RiverStreet Wireless of Virginia Inc.	Eric Cramer	ericcramer@myriverstreet.net
Scott County Telephone Cooperative	William J. Franklin	billfranklin@sctc.org
Shenandoah Cable Television, LLC	Derek Rieger	Derek.rieger@emp.shentel.com
Shenandoah Telephone Company	Chris Kyle	chris.kyle@emp.shentel.com
SILVER DISTRICT COMMUNICATIONS LLC	Steve Schulte	steve.schulte@brambleton.com
Spectrotel of Virginia, LLC	Vanessa Leon	vanessa.leon@spectrotel.com
SQF, LLC	Nicholas Bournakel	nbournakel@tilsontech.com
Starpower Communications, LLC	Joseph O. Kahl	joseph.kahl@rcn.net
Summit Infrastructure Group, LLC	Lee Grant**	lgrant@SummitIG.com
SummitIG, LLC	Lee Grant**	lgrant@SummitIG.com
Sunset Digital Communications (DE), LLC	Chad Wachter**	cwachter@itchold.com
Sunset Fiber (DE), LLC	Chad Wachter**	cwachter@itchold.com
Sunset Fiber, LLC	Ryan Elswick**	ryanelswick@gmail.com
Talk America of Virginia, LLC d/b/a Cavalier	Becky West**	Becky.West@windstream.com
Talk America Services, LLC	Becky West**	Becky.West@windstream.com
Telco Experts, LLC	Alex Green	alex@telcoexperts.com
TelCove Operations, LLC	Al Lubeck**	al.lubeck@lumen.com
Teleport Communications America, LLC	Richard T. "Chip" Howell**	rh2514@att.com
Teliix Virginia, LLC	David Aldworth	daldworth@teliix.com

Tier 1 Fiber, LLC	Richelle Johnson	rjohnson@fibernetworkservices.com
TIME CLOCK SOLUTIONS, LLC	Vance Witt	compliance@yourtimeclocksolution.com
Time Warner Cable Inform. Services (VA), LLC	Lynn Notarianni	Lynn.Notarianni@charter.com
Town of Bedford	Elvin Ray Epting	eepting@bedfordva.gov
Town of Front Royal	Jonathan McMahon	jmcMahon@frontroyalva.com
Trans National Comm. Intrl. of VA, LLC	Erik Robinson	regulatory@tncii.com
Triton Networks, LLC	Danielle Heard	dheard@tritonnet.com
Unite Private Networks, L.L.C.	Matt Wiltanger	legaldept@upnfiber.com
United Federal Data of Virginia, LLC	Christopher Lodge	chris@ufd.com
Uniti Dark Fiber LLC	Jeffery R. Strenkowski	jeffery.strenkowski@uniti.com
United Telephone Southeast LLC	Ted M. Hankins**	ted.hankins@brightspeed.com
US LEC of Virginia L.L.C.	Becky West**	Becky.West@windstream.com
Verizon Select Services of Virginia Inc.	Dayanara Fierro	Dayanara.fierro@verizon.com
Verizon South Inc.	Iris Adams**	iris.adams@verizon.com
Verizon Virginia LLC	Iris Adams**	iris.adams@verizon.com
Vero Fiber Networks, LLC	Scott Beer	sbeer@veronetworks.com
Virginia Global Communications Systems, Inc.	Dusan Janjic	djanjic@rockbridge.net
Virginia Telephone Company	Bruce Mottern**	bruce.mottern@tdstelecom.com
Vivacity Networks, LLC	Greg Benak	greg.benak@ex2technology.com
Vodafone Americas Virginia Inc.	Blair Rosenthal	Blair.rosenthal@vodafone.com
Voxbeam Telecommunications, Inc.	Paul Cusack	pcusack@voxbeam.com
WANRack, LLC	Rob Oyler	rob.oyler@WANRack.com
Waterford Telephone Company	Bruce Davis	waterfordtelephonecompany@gmail.com
Wholesale Carrier Services of Virginia, Inc.	Chris Barton	cbarton@wvcs.com
Wide Voice, LLC	Andrew Nickerson	anickerson@widevoice.com
Windstream KDL-VA, Inc.	Becky West**	Becky.West@windstream.com
Woodlawn Communication, LLC	Robbie Payne	rpayne@woodlawn-llc.com
XO Virginia, LLC	Rex Knowles	Rex.knowles@xo.com
YMAX Communications Corp. of Virginia	Mark Pavol	mark.pavol@ymaxcorp.com
YTV, Inc.	Laura Lau	Llalu@globalcloudXchange.com
Zayo Group, LLC	James Simonelli	regulatorytax@zayo.com
ZiTELL LLC	Brandon Camden	Brandon.camden@thesgng.com

** There are some individuals that are listed multiple times on this list -- they only require one email copy of the document(s).